

United States District Court  
Eastern District of Michigan  
Southern Division

United States of America,

Plaintiff,

District Court No. 19-cr-20626

v.

Hon. Nancy G. Edmunds

Emanuele Palma,

Defendant.

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**Unopposed Motion for Enlargement of Time  
to Respond to Motions**

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The United States of America, by and through undersigned counsel, hereby submits this motion for a one-week enlargement of time to respond to two motions in limine (Docket Entries 87 and 89) filed by the defendant Emanuele Palma on November 22, 2021. The government's motion seeks to extend its deadline to respond to defendant's motions to December 13, 2021, from the current deadline of December 6, 2021.

This brief extension of time to respond is sought based on scheduling conflicts affecting the undersigned government attorneys,

specifically filing deadlines and hearings in other matters, along with previously scheduled leave over the Thanksgiving holiday. The government has conferred with counsel for defendant Emanuele Palma with respect to this motion, and defendant has no objection to the government's request.

Respectfully submitted,

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Acting United States Attorney  
Eastern District of Michigan

TODD S. KIM  
Assistant Attorney General  
Environment & Natural  
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/s/ John K. Neal  
JOHN K. NEAL  
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/s/ Todd W. Gleason  
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JOSEPH BEEMSTERBOER  
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United States Department of Justice

/s/ Jason M. Covert  
JASON M. Covert  
Trial Attorney

Dated: November 30, 2021

CERTIFICATE OF SERVICE

I hereby certify that on November 30, 2021, I caused a copy of this motion to be served on all counsel of record by filing it through the Court's ECF system.

*s/John K. Neal*

John K. Neal